

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

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UNITED STATES OF AMERICA

v.

BERK ERATAY,
Defendant.

Docket No. 5:22-cr-00058-gwc

SUPERSEDING INFORMATION

The United States Attorney charges:

Count One

Between in or about May 2017 and in or about February 2018, within the District of Vermont and elsewhere, the defendant, BERK ERATAY, together with Aron Lee Ethridge, Serhat Gumrukcu, and Jerry Banks, knowingly and intentionally conspired to cause Jerry Banks to travel in interstate commerce, and to use and cause another to use facilities of interstate commerce, namely cellular telephone networks, with intent that the murder of Gregory Davis be committed, in violation of 18 U.S.C. § 2381, as consideration for the receipt of, and as consideration for a promise and agreement to pay, something of pecuniary value.

(18 U.S.C. § 2381)

Count Two

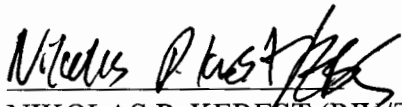
Between on or about January 1, 2018 and on or about January 6, 2018, in the District of Vermont and elsewhere, Jerry Banks, traveled in interstate commerce, and the defendant, BERK ERATAY, along with Serhat Gumrukcu and Aron Ethridge, caused Jerry Banks to travel in interstate commerce, from Colorado to Vermont, with the intent that the murder of Gregory Davis be committed, in violation of the laws of the State of Vermont, as consideration for the receipt of, and as consideration for a promise and agreement to pay, something of pecuniary value.

(18 U.S.C. §§ 1958 & 2)

Count Three

Between in or about the June 2017 and in or about May 2022, the defendant, BERK ERATAY, together with Serhat Gumrukcu, knowingly and intentionally conspired to commit an offense against the United States in violation of Title 18, United States Code, Section 1956, namely to knowingly conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, namely the offense alleged in Count One, designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity, that is withdrawing currency from financial institutions and transferring currency to Aron Ethridge, and that while conducting such financial transactions knew that the monetary funds involved in the financial transactions represented the proceeds of some form of unlawful activity.

(18 U.S.C. §§ 1956(h), 1956(a)(1)(B)(i))



NIKOLAS P. KEREST (PJV/ZBS)
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Burlington, Vermont
March 11, 2024